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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CARLOS INCLAN, JR.,
14 Defendant.

Case No. 2:15-cr-00057-RFB

**STIPULATION TO EXTEND
DEADLINE FOR GOVERNMENT'S
DOMINION EVIDENCE AND TO
FILE PRETRIAL MOTIONS
(Second Request)**

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
17 States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the United
18 States of America, and Rene L. Valladares, Federal Public Defender, and Rebecca A. Levy,
19 Assistant Federal Public Defender, counsel for Carlos Inclan, Jr., agree and stipulate that:

20 1. On August 17, 2018, a status hearing was held wherein the court set dates for
21 the government to disclose dominion evidence to defense counsel and for the filing of pretrial
22 motions. ECF No. 159.

23 2. Since the status hearing both counsel are attempting to work toward a pretrial
24 resolution and need additional time.

25 3. The parties agree that the government's list of dominion evidence is due by
26 September 7, 2018.

1 4. The parties further agree that pretrial motions shall be filed by
2 September 21, 2018.

3 DATED this 29th day of August, 2018.

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5 RENE L. VALLADARES
6 Federal Public Defender

DAYLE ELIESON
United States Attorney

7 /s/ *Rebecca A. Levy*
8 By _____
9 REBECCA A. LEVY
Assistant Federal Public Defender

/s/ *Susan Cushman*
By _____
SUSAN CUSHMAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CARLOS INCLAN, JR.,

7 Defendant.

Case No. 2:15-cr-00057-RFB

ORDER

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10 IT IS ORDERED that the Government's list of additional dominion evidence will be
11 provided to defense counsel by September 7, 2018, and pretrial motions shall be due by
12 September 21, 2018.

13 DATED this 30th day of August, 2018.

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
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